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BUTCH TONGATE
Cabinet Secretary

J. C. BORREGO
Deputy Secretary

Certified Mail – Return Receipt Requested

June 7, 2017

Mr. Joshua Orosco, CRRUA Board Chairman
CRRUA Sunland Park
P.O. Box 429
Sunland Park, New Mexico 88063

**Re: CRRUA Sunland Park Wastewater Treatment Plant; MSGP; SIC 4952; Compliance
Evaluation Inspection; NPDES Permit No. NMR053329; May 11, 2017**

Dear Mr. Joshua Orosco:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

NPDES Enforcement Coordinator
Environmental Protection Agency, Region 6
NPDES Enforcement Branch (6EN-WM)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

May 11, 2017

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David Long is USEPA Region 6's Acting NPDES Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Jennifer Foote at (505)827-0596 or at Jennifer.Foote@state.nm.us.

Sincerely,

/s/ Sarah Holcomb

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
David Long, USEPA (6EN-WM) by e-mail
Robert Houston, USEPA (6EN)
Darlene Whitten-Hill, USEPA (6EN) by e-mail
Amy Andrews, USEPA (6EN-WM) by e-mail
David Esparza, USEPA (6EN-WM) by e-mail
Michael Kesler, NMED District III by e-mail
Carlos Arellano, CRRUA by email



Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5 3 N M R 0 5 3 3 2 9 11 12 1 7 0 5 1 1 17 18 ~ 19 S 20 1					
Remarks					
S E C T O R T T R E A T M E N T W O R K S					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 2	71 N 72 N 73 74 75 80			

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time /Date 9:10 am/5-11-17	Permit Effective Date 6-4-2015
Camino Real Regional Utility Authority (CRRUA) Sunland Park WWTP 1000 McNutt Road Sunland Park, NM 88063 Dona Ana County	Exit Time/Date 4:40pm/5-11-17	Permit Expiration Date 6-4-2020
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Carlos Arellano, Operator, 575-647-7142 Sergio Ruiz, Lab Technician, 575-647-7142	Other Facility Data SIC: 4952 GPS @ Outfall 001: N. 31.7972 W -106.5569	
Name, Address of Responsible Official/Title/Phone and Fax Number Joshua Orosco CRRUA Board Chairman, 575-589-1075 Camino Real Regional Utility Authority (CRRUA) Sunland Park WWTP 1000 McNutt Road Sunland Park, NM 88063	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	U	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	S	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. Inspectors Jennifer Foote (NMED), Ken Aubuchon (EPA), and Amy Andrews (EPA) arrived on site and explained the purpose of the inspections and presented credentials to Mr. Sergio Ruiz and then to Mr. Carlos Arellano once he arrived onsite. A CEI for the NPDES Individual Permit for the POTW was also conducted concurrently on this day by EPA staff. Mr. Arellano provided the SWPPP for review and guided us on a tour of the facility. An exit interview was conducted before the inspectors departed the facility.

2. See attached sheets for further details.

Name(s) and Signature(s) of Inspector(s) Jennifer Foote /s/ Jennifer Foote	Agency/Office/Telephone/Fax NMED/SWQB 505-827-0596	Date 6-7-17
Signature of Management QA Reviewer Sarah Holcomb, Program Manager /s/ Sarah Holcomb	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2798	Date 6-7-17

NPDES Industrial Storm Water Checklist (MSGP)

National Database Information		General	
Inspection Type	Compliance Evaluation	Inspector Name	Jennifer Foote
NPDES ID Number	NMR053329	Telephone	505-827-0596
Inspection Date	5/11/17	Entry Time	9:10am
Inspector Type (circle one)	<input type="checkbox"/> EPA <input checked="" type="checkbox"/> State <input type="checkbox"/> EPA Oversight	Exit Time	4:40pm
Facility Sector/ SIC/Activity Code	Sector T Treatment Works/ SIC 4952	Signature	/s/ Jennifer Foote

Facility Location Information				
Name/Location/ Mailing Address	Camino Real Regional Utility Authority (CRRUA) Sunland Park WWTP 1000 McNutt Road Sunland Park, NM 88063			
GPS Coordinates	Latitude	31.7972	Longitude	-106.5569
Receiving Water(s)	Rio Grande in Water Quality Segment 20.6.4.101 NMAC			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Joshua Orozco, CRRUA Board Chairman	575-589-1075
Facility Contact	Carlos Arellano	575-647-7142
Authorized Official(s)	Joshua Orozco	575-589-1075

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	SWPPP Prepared & Available	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Permit Type	<input checked="" type="checkbox"/> General	<input type="checkbox"/> Individual	SWPPP Contents Satisfactory	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
Operational Date	Feb 2012 (for this operator)		SWPPP Implementation Satisfactory	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
NOI/Application Date	12/2/2015		SWPPP Date	August 2012	
If applicable, is no exposure certification on file?	<input type="checkbox"/> Y	<input type="checkbox"/> N <input checked="" type="checkbox"/> N/A			

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General	Notes:		
Was the SWPPP completed prior to NOI submission?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	SWPPP prepared in August 2012 and has not been updated.
Copy of the NOI and acknowledgment letter from EPA?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Copy of the permit language?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)? Applicable to: <ul style="list-style-type: none"> • Routine facility inspection (4.1.3) • Quarterly visual assessment (4.2.3) • Benchmark monitoring (6.2.1.3). 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Did all "operators" sign/certify the SWPPP?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Is the storm water pollution prevention team identified (name or title)?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	2 of 3 people identified as storm water team are no longer at facility.
Are the storm water pollution prevention team's responsibilities identified?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
SWPPP provides a description of the facility's industrial activities?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Is there a site specific site map?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain the size of the property in acres?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain the location and extent of significant structures and impervious surfaces?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain directions of storm water flow (indicated by arrows)?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain locations of all existing structural control measures?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	TMDL not on map, but described in plan
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.1.3.2?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain locations where significant spills or leaks identified under Part 5.1.3.3 have occurred?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A. SWPPP and operator reports no significant spills or leaks have occurred.
Does the site map contain locations of all storm water monitoring points?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the site map contain locations and descriptions of all non-storm water discharges?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>			Notes:
<p>Does the site map contain locations of the following activities where these activities are exposed to precipitation?</p> <ul style="list-style-type: none"> • Fueling stations • Vehicle and equipment maintenance and/or cleaning areas • Loading/unloading areas • Locations used for the treatment, storage or disposal of wastes • Liquid storage tanks • Processing and storage areas • Immediate access roads and rail lines used or travelled by carriers of raw materials, manufactured products, waste materials, or by-products used or created by the facility • Transfer areas for substances in bulk • Machinery 	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A. SWPPP reports no significant spills or leaks have occurred.

NPDES Industrial Storm Water Checklist (MSGP)

<u>Site Description</u>		Notes:	
<p>Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include:</p> <ul style="list-style-type: none"> Date Description of evaluation criteria List of the outfalls or onsite drainage points directly observed Different types of non-storm water discharges and source locations Actions taken such as a list of control measures for elimination. 	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<p>The five outfalls were evaluated 4-17-2012.</p> <p>Non-stormwater discharges must be re-evaluated under the new 2015 Permit.</p>
Does salt storage occur at this facility?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
<u>Controls to Reduce Pollutants</u>		Notes:	
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<p>Plan states that certain facility improvements would be installed by September 2013. Work included improving the berm to retain all discharges that may contain runoff from exposed material areas for a 100 year storm and removing outfalls 02 and 03. The Rio Grande is less than 500 feet away and impaired for Ecoli and any spills of sludge or grit water could provide a source of pollutants.</p> <p>There was no documentation that work had been done.</p>
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

<u>Controls to Reduce Pollutants</u>			Notes:
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the SWPPP include a schedule for preventative maintenance procedures?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Plan states it will be developed by CRRUA
Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility implement procedures for plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	Fuel tank was removed, other fluids are stored in maintenance building on containment pallet.
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	No records of training.
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

<u>Controls to Reduce Pollutants</u>			Notes:
Does the SWPPP document erosion and sediment controls?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Plan states that certain facility improvements would be installed by September 2013. There was no documentation that work had been done.
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	Plan states that certain facility improvements would be installed by September 2013. There was no documentation that work had been done.
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Employee Training – is there a schedule for regular (at least annually) employee training?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	No training has occurred.
Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
<u>General</u>	Notes:		
Routine Facility Inspections			
Are routine facility inspections conducted at least quarterly while facility operating?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	No inspections have been conducted.
Are inspections documented, including: <ul style="list-style-type: none"> Date and time Name and signature of inspector Weather information and a description of discharge occurring at the time of the inspection Previously unidentified discharges from site Control measures needing maintenance or repairs Failed control measures that need replacement Incidents of noncompliance observed Additional control measures needed. 	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Exceptions, including (see 4.1.3): <ul style="list-style-type: none"> Inactive and unstaffed sites 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Quarterly Visual Assessment			
Are quarterly visual assessments conducted?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	No quarterly visual assessments have been conducted.
Does the assessment consist of a sample collected: <ul style="list-style-type: none"> Within the first 30 minutes of discharge On discharges that occur at least 72 hours (3 days) from the previous discharge Collected in a clean, clear glass or plastic container. 	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

Inspections			
<p>Are assessments documented, including:</p> <ul style="list-style-type: none"> • Sample location • Sample collection date/time & visual assessment date/time • Personnel collecting sample & performing assessment and their signature • Nature of the discharge (runoff or snowmelt) • Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) • Probable sources of contamination • If applicable, reason for not taking samples within 1st 30 minutes. 	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	<p>A daily rainfall record is kept.</p>
<p>Exceptions, including (see 4.2.3):</p> <ul style="list-style-type: none"> • Adverse weather conditions • Climates with irregular storm water runoff • Areas subject to snow • Substantially identical outfalls (per 5.1.5.2) • Inactive and unstaffed sites. 	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Comprehensive Site Inspections			
Are comprehensive site inspections conducted annually (start 9/29/08)?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Conducted by qualified personnel including at least one member of the storm water pollution prevention team?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Cover all areas of the facility?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	
Include a review of monitoring data? Do inspectors consider the results of the past year's visual and analytical monitoring when planning and conducting inspections?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	

NPDES Industrial Storm Water Checklist (MSGP)

Inspections		
<p>Include observations of the following:</p> <ul style="list-style-type: none"> • Industrial materials, residue, or trash that may have or could come into contact with storm water • Leaks or spills from industrial equipment, drums, tanks, and other containers • Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site • Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas • Control measures needing replacement, maintenance, or repair • All storm water control measures observed. 	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
<p>Are inspections documented, including:</p> <ul style="list-style-type: none"> • Date of inspection • Names and titles of personnel making the inspection • Findings from examination of areas of facility from Part 4.3.1 • All observations relating to implementation of control measures • Any required revisions to the SWPPP resulting from inspection • Any incidents of noncompliance identified OR certification that facility is in compliance with the permit • A statement signed in accordance with Appendix B, Subsection 11 	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring (Part 6)			
General	Notes:		
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Are samples analyzed in accordance with 40 CFR Part 136 methods?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Benchmark Monitoring			
Does the monitoring consist of a sample collected: <ul style="list-style-type: none"> • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall • Prior to commingling. 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Is the average of the first four quarterly samples < the parameter benchmark?	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

Monitoring			
<p>Is the average of the first four quarterly samples > the parameter benchmark?</p> <ul style="list-style-type: none"> Make the necessary modifications Continue quarterly monitoring Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA Natural background pollutant level documentation 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<p>Exceptions, including (see 6.1 & 6.2):</p> <ul style="list-style-type: none"> Adverse weather conditions Climates with irregular storm water runoff Snowmelt Substantially identical outfalls (per 5.1.5.2) Inactive and unstaffed sites. 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Effluent Limitations Monitoring			
<p>Sampled once per year?</p>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<p>Follow-up requirements if discharge exceeds effluent limit (see 6.3)?</p>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Other Required Monitoring			
<ul style="list-style-type: none"> State or Tribal provisions Discharges to impaired waters Additional monitoring required by EPA. 	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
Reporting (Part 7)			
<u>General</u>		Notes:	
<p>Is monitoring data reported to EPA within 30 days of receiving analytical results for the monitoring period?</p>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A
<p>Is the annual report submitted by 45 days after conducting the comprehensive site inspection?</p>	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N	No annual report submitted.
<p>If follow-up effluent limitations monitoring results exceed numeric limits, was a report submitted to EPA no later than 30 days after results were received?</p>	<input type="checkbox"/> Y	<input type="checkbox"/> N	N/A

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff	<p><i>(e.g., use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away; locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems; clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible; use spill/overflow protection equipment; drain fluids from equipment and vehicles prior to on-site storage or disposal; perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and ensure that all washwater drains to a proper collection system)</i></p> <p>Some items such as fluids are stored indoors on pallets. Rusty manhole/valve covers were located on the ground on the northeast side of the site.</p> <p>The sludge belt press is partially covered and trucks used to transport the sludge are parked in an area that drains to the headworks.</p> <p>Site has several storm drains which may allow an overflow from the temporarily re-piped grit drain to run off from the facility.</p>
Good Housekeeping	<p><i>(e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)</i></p> <p>In general the site was orderly.</p>
Preventative maintenance	<p><i>(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)</i></p> <p>No records of maintenance were in the SWPPP Plan. It was difficult to locate the outfalls due to sediment and vegetation buildup.</p>

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Spill Prevention and Response	<p><i>(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)</i></p> <p>Spill procedures and response are discussed in SWPPP. Operator stated no spill events had occurred.</p>
Erosion and Sediment Controls	<p><i>(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)</i></p> <p>Plan states that certain facility improvements would be installed by September 2013. There was no documentation that work had been done. Site is generally flat and dry, no significant erosion noted.</p>
Management of Runoff	<p><i>(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)</i></p> <p>Plan states that certain facility improvements would be installed by September 2013. Work included improving the berm to retain all discharges that may contain runoff from exposed material areas for a 100 year storm and removing outfalls 02 and 03. The Rio Grande is less than 500 feet away and impaired for Ecoli and any spills of sludge or grit water could provide a source of pollutants.</p> <p>There was no documentation that work has been done.</p>
Salt Storage Piles	<p><i>(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)</i></p> <p>N/A</p>

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Waste, Garbage and Floatable Debris	<p><i>(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)</i></p> <p>In general the site was orderly.</p>
Evidence of non-storm water discharges	<p>No non-stormwater discharges were observed on the day of the inspection.</p> <p>However, if a spill or overflow were to occur where the grit drain has been temporarily reconfigured, the influent could discharge to the nearby storm drain.</p>
Dust Generation and Vehicle Tracking of Industrial Materials	<p><i>(minimize generation of dust and off-site tracking of raw, final, or waste materials)</i></p> <p>Access road is unpaved, no tracking of sludge noted.</p>